

EXHIBIT A

Email, dated December 6, 2024, from Andrew Zatz to Joseph R. Brandt

From: [Zatz, Andrew](#)
To: [Brandt, Joseph](#); [Lauria, Thomas E](#); [Shore, Christopher](#); [Hershey, Samuel](#); [Bakemeyer, Brett](#); [Smith, Erin](#); [Schultz, Kristin](#)
Cc: [FRGAssociates](#); [Sinclair, Debra](#); [Morton, Edmon](#); [Mielke, Allison S.](#); [Borovinskaya, Shella](#); [Lombardi, Stuart](#)
Subject: RE: FRG - Schedules & Statements Extension Motion
Date: Friday, December 6, 2024 3:03:43 PM

*** **EXTERNAL EMAIL** ***

Confirmed.

Andrew Zatz | Partner

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From: Brandt, Joseph (External) <jbrandt@willkie.com>

Date: Friday, Dec 06, 2024 at 2:59 PM

To: Lauria, Thomas E <tlauria@whitecase.com>, Zatz, Andrew <azatz@whitecase.com>, Shore, Christopher <cshore@whitecase.com>, Hershey, Samuel <sam.hershey@whitecase.com>, Bakemeyer, Brett <brett.bakemeyer@whitecase.com>, Smith, Erin <erin.smith@whitecase.com>

Cc: FRGAssociates <FRGAssociates@willkie.com>, Sinclair, Debra <DSinclair@willkie.com>, Morton, Edmon (External) <EMorton@ycst.com>, Mielke, Allison S. <AMielke@ycst.com>, Borovinskaya, Shella <SBorovinskaya@ycst.com>, Lombardi, Stuart <slombardi@willkie.com>

Subject: [EXT] FRG - Schedules & Statements Extension Motion

Subject to FRE 408

W&C Team – I write regarding the Freedom Lender Group’s objection [Docket No. 296] (the “Objection”) to the Debtors’ pending motion [Docket No. 254] (the “Motion”) to extend the deadline by which the Debtors must file their schedules and statements. The Debtors confirm that the hearing on their pending motion to approve the disclosure statement will be adjourned from December 17, 2024, to January 15, 2025, and the objection deadline for the motion will be set for a date that is later than December 20 (i.e., the schedules and statements extension deadline requested in the Motion).

In light of this adjournment and the language included in ¶4 of the Objection (pasted below), could you please confirm that the Objection is resolved?

“If the Debtors’ sale and plan timelines are modified such that the Debtors’ SOFAs and Schedules would be filed prior to the objection deadline for their disclosure statement, this Objection would be resolved. If, however, the Debtors insist on adhering to their proposed schedule and the Court is not inclined to adjourn the hearing on the Debtors’ disclosure statement motion, the Motion should be denied.”

We would appreciate your response as soon as possible today.

Thanks,
Joe

Joseph Brandt

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